

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

REBECCA A. PETERSON, #241858
ROBERT K. SHELQUIST (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
rkshelquist@locklaw.com
rapeterson@locklaw.com

**LITE DEPALMA GREENBERG &
AFANADOR, LLC**

SUSANA CRUZ HODGE (*pro hac vice*)
JOSEPH J. DEPALMA (*pro hac vice*)
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
jdepalma@litedepalma.com
scrushodge@litedepalma.com

Plaintiffs' Interim Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In Re Plum Baby Food Litigation,

This document relates to:

All Actions.

Case No. 4:21-cv-913-YGR

**PLAINTIFFS' CO-LEAD COUNSEL'S
SUPPLEMENTAL SUBMISSION
REGARDING TIME AND EXPENSE
REPORTING PROTOCOL**

Plaintiffs' Co-Lead Counsel respectfully submit this supplemental submission regarding the structure of Co-Lead Counsel's responsibilities pursuant to the Court's July 30, 2021 Order (ECF No. 79), instructing Co-Lead counsel to:

Develop and recommend for Court approval practices and procedures pertaining to attorneys' fees and expenses as further detailed below and, on an ongoing basis, monitor and administer such procedures.

1 *Id.* at 10. In accordance with the Court’s Order, Co-Lead Counsel respectfully submit the protocol
2 outlined in the Proposed Order filed herewith. The protocol outlined in the Proposed Order defines
3 those activities and expenses that may be included in a future petition for an award of attorneys’
4 fees and/or reimbursement of expenses and establishes appropriate limitations for the guidance of
5 counsel. It also established clear standards for proper record-keeping of time and expenses and
6 outlines the procedures for counsel to document and report their time and expenses on a monthly
7 basis.
8

9 This protocol is also consistent with many of the time-tested recommendations found in
10 leading treatises. “At an early conference or in an early pretrial order after consultation with
11 counsel, it is helpful to establish guidelines and procedures that will lighten the burdens on the
12 participants, clarify expectations, and reduce the opportunities for disputes.” MANUAL FOR
13 COMPLEX LITIGATION (FOURTH) § 14.211 (2004); *see id.* §§ 14.211-216 (recommending coverage
14 of matters such as staffing levels, record-keeping procedures, and ground rules for reimbursement
15 of expenses); 5 William B. Rubenstein, NEWBERG ON CLASS ACTIONS § 15:5 (2015) (“Initial
16 guidelines may address a host of topics” relating to, *inter alia*, staffing, timekeeping rules, and
17 expenses).
18

19 Plaintiffs respectfully request that the Court enter the Proposed Order submitted herewith.
20
21
22
23
24
25
26
27
28

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

By: s/ Rebecca A. Peterson

REBECCA A. PETERSON, #241858

ROBERT K. SHELQUIST (*pro hac vice*)

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

E-mail: rkshelquist@locklaw.com

rapeterson@locklaw.com

**LITE DEPALMA GREENBERG &
AFANADOR, LLC**

SUSANA CRUZ HODGE (*pro hac vice*)

JOSEPH J. DEPALMA (*pro hac vice*)

570 Broad Street, Suite 1201

Newark, NJ 07102

Telephone: (973) 623-3000

E-mail: jdepalma@litedepalma.com

scrushodge@litedepalma.com

Plaintiffs' Interim Co-Lead Class Counsel